

**SILLS CUMMIS & GROSS P.C.**

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*Counsel to the Debtors  
and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

NATIONAL REALTY INVESTMENT  
ADVISORS, LLC, *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-14539 (JKS)

(Jointly Administered)

**NOTICE OF AGENDA OF MATTERS SCHEDULED  
FOR HEARING ON AUGUST 9, 2022 AT 10:00 A.M. (ET)**

**RESOLVED MATTERS**

1. Motion of Jean-Michel Appolon, Thomas Cooper, Allen Cvelic and Martina Gudac Cvelic, Husband & Wife, Andrew Maretz, Thomas J. Cioffe, Cioffe Enterprises, Inc., Thomas James Cioffe, Jr., Joseph Occhiogrosso, Annemarie Occhiogrosso, Robert Zukowski, and Anthony Siriani for Entry of an Order Appointing a Chapter 11 Trustee Pursuant to 11 U.S.C. § 1104(a) or, in the Alternative, to Convert the Chapter 11 Cases to Chapter 7 of the Bankruptcy Code [Docket No. 136; Filed 7/13/22]

Response Deadline: 8/2/22

Response(s) Received: None

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<sup>1</sup> A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://omniagentsolutions.com/NRIA>. The location of the Debtors' service address is: 1 Harmon Plaza, Floor 9, Secaucus, New Jersey 07094.

Related Document(s):

- a) Certificate of Service [Docket No. 137; Filed 7/13/22]
- b) Movant's Letter Requesting Status Conference [Docket No. 161; Filed 7/18/22]
- c) Debtors' Motion for Entry of an Order Pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure (A) Settling the Chapter 11 Trustee Motion; (B) Establishing a Board of Independent Managers for National Realty Investment Advisors, LLC; (C) Authorizing the Debtors to (I) Retain Turnaround Advisors, LLC to Provide a Chief Restructuring Officer, *Nunc Pro Tunc* to August 1, 2022, and (II) Approve the Agreement Related Thereto; and (D) Granting Related Relief [Docket No. 225; Filed 8/1/22] (the "**9019 Motion**")

Status: This matter has been resolved pursuant to the 9019 Motion.

**UNCONTESTED MATTERS GOING FORWARD**

- 2. Motion by Spector Gadon Rosen Vinci, P.C. to Withdraw as Counsel for Andrew Maretz [Docket No. 168; Filed 7/19/22]

Response Deadline: 8/2/22

Response(s) Received: None.

Related Document(s): Certification of No Objection Regarding Motion by Spector Gadon Rosen Vinci, P.C. to Withdraw as Counsel for Creditor Andrew Maretz [Docket No. 242; Filed 8/4/22]

Status: This matter is going forward. No objections have been filed.

**CONTESTED MATTERS GOING FORWARD**

- 3. Debtors' Motion for Entry of an Order Pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure (A) Settling the Chapter 11 Trustee Motion; (B) Establishing a Board of Independent Managers for National Realty Investment Advisors, LLC; (C) Authorizing the Debtors to (I) Retain Turnaround Advisors, LLC to Provide a Chief Restructuring Officer, *Nunc Pro Tunc* to August 1, 2022, and (II) Approve the Agreement Related Thereto; and (D) Granting Related Relief [Docket No. 225; Filed 8/1/22]

Response Deadline: 8/8/22 at 5:00 p.m. (ET)

Response(s) Received:

- a) None to date. However, the Debtors understand that the United States Trustee intends to file an objection.

Related Document(s):

- a) Application for Entry of an Order Shortening Time Period for Notice Under Fed. R. Bankr. P. 9006(c)(1), Limiting Notice, and Setting Hearing for Approval of Debtors' Motion for Entry of an Order Pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure (A) Settling the Chapter 11 Trustee Motion; (B) Establishing a Board of Independent Managers for National Realty Investment Advisors, LLC; (C) Authorizing the Debtors to (I) Retain Turnaround Advisors, LLC to Provide a Chief Restructuring Officer, *Nunc Pro Tunc* to August 1, 2022, and (II) Approve the Agreement Related Thereto; and (D) Granting Related Relief [Docket No. 226; Filed 8/1/22]
- b) Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice [Docket No. 229; Filed 8/2/22]
- c) Committee Letter in Support of Application to Shorten Time [Docket No. 230; Filed 8/2/22]
- d) Certificate of Service [Docket No 240; Filed 8/3/22]
- e) Certification of Supplemental Service [Docket No. 243; Filed 8/4/22]

Status: This matter is going forward.

- 4. U.S. Construction's Motion for Order Compelling Performance and/or Assumption of Agreements and for Related Relief [Docket No. 125; Filed 7/12/22]

Response Deadline: 8/2/22 at 4:00 p.m. (ET)

Response(s) Received:

- a) Debtors' Objection to U.S. Construction, Inc.'s Motion to Compel Performance and/or Assumption of Agreements and for Related Relief [Docket No. 222; Filed 8/1/22]
- b) Objection of the Official Committee of Unsecured Creditors to the Motion of U.S. Construction, Inc. for an Order Compelling Performance and/or Assumption of Agreements [Docket No. 231; 8/2/22]

- c) U.S. Construction's Reply to Opposition to Motion to Compel Performance and/or Assumption of Agreements and for Related Relief [Docket No. 249; Filed 8/5/22]

Related Document(s):

- a) U.S. Construction's Application for Order Shortening Time [Docket No. 126; Filed 7/12/22]
- b) Debtors' Letter to Judge Sherwood in Opposition to U.S. Construction's Application to Shorten Time [Docket No. 127; Filed 7/13/22]
- c) The Committee's Letter to Judge Sherwood in Opposition to U.S. Construction's Application to Shorten Time [Docket No. 131; Filed 7/13/22]
- d) Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice [Docket No. 145; Filed 7/14/22]
- e) Certification of Service [Docket No. 146; Filed 7/14/22]

Status: This matter is going forward.

Dated: August 5, 2022

**SILLS CUMMIS & GROSS P.C.**

/s/ S. Jason Teele

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